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5 UNITED STATES DISTRICT COURT
6 NORTHWERN DISTRICT OF CALIFORNIA
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8 OAKLAND DIVISION

9 AKHILESH R. VANGALA; I.S.A.; and
10 KENNY M. CASTANEDA PENATE, on
11 behalf of themselves and
all others similarly situated,

12 Plaintiffs,

13 v.
14

15 U.S. CITIZENSHIP AND IMMIGRATION
16 SERVICES and U.S. DEPARTMENT OF
17 HOMELAND SECURITY,

18 Defendants.
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Case No. 4:20-cv-08143-HSG

**JOINT MOTION FOR APPROVAL OF
SETTLEMENT: [PROPOSED ORDER]**

Hon. Haywood S. Gilliam, Jr.

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21 The parties hereby jointly request that this Court approve and adopt the attached
22 Settlement Agreement and dismiss this case. Attached as Exhibit 1 is the parties' Settlement
23 Agreement that proposes a settlement of this case, as modified to reflect the Court's instructions
24 from the Case Management Conference from July 13, 2021. The substantial relief provided by
25 the Settlement Agreement to the Plaintiffs will also provide relief for more than sixty thousand
26 applicants similarly situated to Plaintiffs. Although Plaintiffs' Complaint was filed as a putative
class action and Plaintiffs filed a motion for class certification on November 19, 2020, briefing

has not been completed and no class has been certified. Furthermore, Defendants, agreed to rescind the policy challenged in the Complaint and agreed to provide relief to Plaintiffs as well as to other similarly situated individuals, as laid out in the Settlement Agreement. As such, this Court's order adopting the Settlement Agreement provides relief beyond the Plaintiffs without the need for protracted litigation and the accompanying drain of resources required to certify a class and bind class members to any such settlement. Accordingly, the Parties respectfully request this Court adopt the Settlement Agreement and dismiss this case.

DATED: July 19, 2021

Respectfully submitted,

s/ Matt Adams

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[PROPOSED] ORDER

Pursuant to the stipulation of the parties, and good cause having been shown, it is hereby ordered that the Settlement Agreement Attached as Exhibit 1 is approved and the case is dismissed.

IT IS SO ORDERED.

DATED: _____

HON. HAYWOOD S. GILLIAM, JR.
United States District Judge